

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS

JOHN ARDEN AHNEFELDT, ROBERT	§	CIVIL ACTION NO. 4:20-CV-02539
BROWER, JR., ROBERT BROWER, SR.,	§	
KHANH L. BUI, JIGNESH CHANDARANA,	§	NOTICE OF MOTION AND MOTION OF
KRUITIKA CHANDARANA, AMIRA	§	JOHN VUONG FOR APPOINTMENT AS
YOUSUF CHOWDHURY, CHRISTOPHER	§	LEAD PLAINTIFF AND APPROVAL OF
COLIGADO, DANIEL GAD, EDWIN	§	LEAD PLAINTIFF'S SELECTION OF
HOWELL, SIOE LIE HOWELL, DARREN	§	COUNSEL
HUNTING, ANNE INGLEDREW, SHITAL	§	
MEHTA, THOMAS CARL RABIN, ADAM	§	CLASS ACTION
SHULTZ, AMIT SOMANI, JAYAPRAKASH	§	
SRINIVASAN, AARTHI SRINIVASAN,	§	
CHRISTOPHER SWEDLOW and	§	
ALEXANDRE TAZI, Individually and on	§	
Behalf of All Others Similarly Situated,	§	
	§	
Plaintiff,	§	
	§	
v.	§	
	§	
DAVID DICKSON, STUART A. SPENCE,	§	
and CHRISTOPHER A. KRUMMEL,	§	
	§	
Defendants.	§	
	§	

Movant John Vuong (“Movant”), through counsel, hereby moves the Court pursuant to Section 21D of the Securities and Exchange Act of 1934, 15 U.S.C. § 78u-4(a)(3)(B), as amended by the Private Securities Litigation Reform Act of 1995 (the “PSLRA”), for an order:

- (a) appointing Movant as Lead Plaintiff in this action; and
- (b) approving Movant’s selection of The Rosen Law Firm P.A. as Lead Counsel and Steckler Gresham Cochran PLLC as Liaison Counsel for the litigation and all subsequently filed related litigations.

In support of this Motion, Movant submits: (1) a Memorandum of Law dated September 16, 2020; (2) Appendix Accompanying Movant’s Motion, dated September 16, 2020; and (3) a

[Proposed] Order Appointing Movant as Lead Plaintiff and Approving Movant's Selection of Counsel.

CERTIFICATE OF CONFERENCE

Local Rule 7.1(D) requires a conference of counsel prior to filing motions. Due to the PSLRA's lead plaintiff procedure, however, Movant does not yet know which other entities or persons plan to move for appointment as lead plaintiff until after all the movants have filed their respective motions. Under these circumstances, Movant respectfully requests that the conferral requirement of Local Rule 7.1(D) be waived.

Dated: September 16, 2020

Respectfully submitted,

STECKLER GRESHAM COCHRAN PLLC

/s/ R. Dean Gresham

R. Dean Gresham
Texas Bar No. 24075247 (SD Bar 7438)
12720 Hillcrest Rd, Suite 1045
Dallas, Texas 75230
Telephone: (972) 387-4040
Facsimile: (972) 387-4041
Email: dean@sgc.law

[Proposed] Liaison Counsel for Plaintiff and Class

-and-

THE ROSEN LAW FIRM, P.A.

Laurence Rosen, Esq.
Phillip Kim, Esq.
275 Madison Avenue, 40th Floor
New York, NY 10116
Phone: (212) 686-1060
Fax: (212) 202-3827
Email: lrosen@rosenlegal.com
Email: pkim@rosenlegal.com

[Proposed] Lead Counsel for Plaintiff and Class

CERTIFICATE OF SERVICE

I hereby certify that on this 16th day of September 2020, a true and correct copy of the foregoing document was served by CM/ECF to the parties registered to the Court's CM/ECF system.

/s/ R. Dean Gresham

R. Dean Gresham